

Christine Y. Wong, Bar No. 284026  
ChristineWong@mofo.com  
Morrison & Foerster LLP  
425 Market Street  
San Francisco, California 94105-2482  
Telephone: 415.268.7000  
Facsimile: 415.268.7522  
Attorney for Gary Szukalski

Ted W. Cassman, Bar No. 98932  
Raphael M. Goldman, Bar No. 229261  
goldman@achlaw.com  
cassman@achlaw.com  
Arguedas, Cassman, Headley & Goldman LLP  
803 Hearst Avenue  
Berkeley, CA 94710  
Telephone: (510) 845-3000  
Facsimile: (510) 845-3003  
Attorneys for Nicole Eagan

Thomas H. Bienert, Jr., Bar No. 135311  
Sandra Lechman, Bar No. 288660  
[tbienert@bklwlaw.com](mailto:tbienert@bklwlaw.com)  
[slechman@bklwlaw.com](mailto:slechman@bklwlaw.com)  
Bienert Katzman Littrell Williams LLP  
CalEdison Building  
601 W. 5th Street, Suite 720  
Los Angeles, CA 90071  
Telephone: (213) 528-3400  
Facsimile: (949) 369-3701  
Attorneys for Rob Sass

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Case No. 3:18-cr-577-CRB

Plaintiff,

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO RULE 17  
SUBPOENAS: ORDER**

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

#### Defendants.

Pursuant to Federal Rule of Criminal Procedure 45(b), Gary Szukalski, Rob Sass, and Nicole Eagan respectfully submit this stipulation for a second sixty (60) day extension of time in

**STIPULATION FOR EXTENSION OF TIME TO RESPOND TO  
RULE 17 SUBPOENAS Case No. 3:18-cr-577-CRB**

1 which to produce documents requested by counsel for the United States in the above captioned  
2 matter.

3 On June 8, 2022, this Court issued Rule 17 Subpoenas to Testify and Produce Documents  
4 or Objects in a Criminal Case (the "Subpoenas") to each of Gary Szukalski, Rob Sass, and Nicole  
5 Eagan (the "Subpoena Recipients"). The original deadline to provide responsive documents was  
6 October 5, 2022. On October 5, 2022, the Court extended the original deadline to December 5,  
7 2022. If the Court grants this stipulation, the response will instead be due Friday, February 3,  
8 2023.

9 Counsel for the Subpoena Recipients informed counsel for the United States of their  
10 intention to seek this extension. The United States does not oppose and joins in this stipulation.  
11 In support of this stipulation, the Subpoena Recipients state the following:

12 1. There is good cause to grant this stipulation. While reserving all rights regarding  
13 objections to the subpoena, the Subpoena Recipients are engaged in discussions with the United  
14 States regarding the scope of documents sought by the Subpoenas.

15 2. In the interest of judicial efficiency and to allow time for these discussions to continue,  
16 the Subpoena Recipients request that this Court allow a 60 day extension of time in which to  
17 produce documents.

18 3. The United States has consented to the requested extension and would not be  
19 prejudiced if it were granted. Moreover, given that this matter is not yet set for trial, the  
20 extension sought will not delay the Court's proceedings.

21 5. For the foregoing reasons, the Subpoena Recipients respectfully request that, in  
22 accordance with this stipulation, the time in which they may produce documents responsive to the  
23 Subpoenas be extended by sixty days, to and including February 3, 2023.

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STIPULATION FOR EXTENSION OF TIME TO RESPOND TO  
RULE 17 SUBPOENAS  
Case No. 3:18-cr-577-CRB

SF:4937486

1 Dated: November 28, 2022

MORRISON & FOERSTER LLP

3 By: /s/ Christine Y. Wong  
4 Christine Y. Wong

5 Attorney for Gary Szukalski

6 Dated: November 28, 2022

7 By: /s/ Ted W. Cassman  
8 Ted W. Cassman

9 Attorney for Nicole Eagan

10 Dated: November 28, 2022

11 By: /s/ Stephen James Binhak  
12 Stephen James Binhak

13 Attorney for Rob Sass (admitted pro hac vice)

14 Dated: November 28, 2022

16 By: /s/ Adam A. Reeves  
17 Adam A. Reeves

18 Assistant United States Attorney

28 STIPULATION FOR EXTENSION OF TIME TO RESPOND TO  
RULE 17 SUBPOENAS  
Case No. 3:18-cr-577-CRB

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Christine Y. Wong, Bar No. 284026  
ChristineWong@mofo.com  
Morrison & Foerster LLP  
425 Market Street  
San Francisco, California 94105-2482  
Telephone: 415.268.7000  
Facsimile: 415.268.7522  
Attorney for Gary Szukalski

Ted W. Cassman, Bar No. 98932  
Raphael M. Goldman, Bar No. 229261  
[goldman@achlaw.com](mailto:goldman@achlaw.com)  
[cassman@achlaw.com](mailto:cassman@achlaw.com)  
Arguedas, Cassman, Headley & Goldman LLP  
803 Hearst Avenue  
Berkeley, CA 94710  
Telephone: (510) 845-3000  
Facsimile: (510) 845-3003  
Attorneys for Nicole Eagan

Thomas H. Bienert, Jr., Bar No. 135311  
Sandra Lechman, Bar No. 288660  
[tbienert@bklwlaw.com](mailto:tbienert@bklwlaw.com)  
[slechman@bklwlaw.com](mailto:slechman@bklwlaw.com)  
Bienert Katzman Littrell Williams LLP  
CalEdison Building  
601 W. 5th Street, Suite 720  
Los Angeles, CA 90071  
Telephone: (213) 528-3400  
Facsimile: (949) 369-3701  
Attorneys for Rob Sass

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Case No. 3:18-cr-577-CRB

Plaintiff,

**[PROPOSED] ORDER EXTENDING  
TIME TO RESPOND TO RULE 17  
SUBPOENAS**

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

#### Defendants.

**FOR GOOD CAUSE SHOWN**, based upon the facts set forth in the stipulation and the representations of the parties, the Court hereby grants Gary Szukalski, Nicole Eagan, and Rob

**[PROPOSED] ORDER EXTENDING TIME TO RESPOND TO  
RULE 17 SUBPOENAS**  
Case No. 3:18-cr-577-CRB

Sass (the “Subpoena Recipients”) a sixty (60) day extension of time in which to produce documents in response to the June 8, 2022 Court issued Rule 17 Subpoenas to Testify and Produce Documents or Objects in a Criminal Case (the “Subpoenas”).

The Subpoena Recipients' deadline to produce documents responsive to the Subpoenas is extended by sixty days, to and including February 3, 2023.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: November 28, 2022

**THE HONORABLE CHARLES R. BREYER**  
**United States District Judge**

[PROPOSED] ORDER EXTENDING TIME TO RESPOND TO  
RULE 17 SUBPOENAS  
Case No. 3:18-cr-577-CRB